

1 STEVEN T. JAFFE, ESQ.

2 Nevada Bar No. 7035

2 [sjaffe@halljaffe.com](mailto:sjaffe@halljaffe.com)

3 **HALL JAFFE, LLP**

3 7425 Peak Drive

4 Las Vegas, Nevada 89128

4 Phone: (702) 316-4111

5 Facsimile: (702) 316-4114

6 JOHN P. SHANNON, ESQ.

6 Nevada Bar No. 7906

7 [John@jpshannonlaw.com](mailto:John@jpshannonlaw.com)

7 JASON S. COOK, ESQ.

8 Nevada Bar No. 7965

8 [jason@williamshannonlaw.com](mailto:jason@williamshannonlaw.com)

9 **LAW OFFICE OF WILLIAM H. JACKSON, LLC**

9 3320 N. Buffalo Drive, Ste. 202

10 Las Vegas, Nevada 89129

10 Phone: (702) 489-3030

11 Facsimile: (702) 489-3033

12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ESTEVAN ALVARADO-HERRERA, an  
16 individual,

17 Plaintiff,

18 v.

19 ACUITY A MUTUAL INSURANCE  
COMPANY, a Wisconsin corporation; and  
20 DOES I through XX, inclusive,

21 Defendants.

Case No. 2:22-cv-00438-CDS-NJK

**[PROPOSED] STIPULATION AND  
ORDER TO EXTEND DEADLINE TO  
FILE JOINT PRE-TRIAL ORDER**

22 COMES NOW Plaintiff ESTEVAN ALVARADO-HERRERA, by and through his  
23 counsel of record, Steven T. Jaffe, Esq., of Hall Jaffe, LLP, and John P. Shannon, Esq., and Jason  
24 S. Cook, Esq., and Defendant ACUITY A MUTUAL INSURANCE COMPANY, by and through  
25 its counsel, David J. Feldman, Esq., and Rachel J. Holzer, Esq., of The Feldman Firm. The parties  
26 stipulate to extend the deadlines for filing and submission of the Joint Pre-Trial Order in this  
27 matter. Specifically, the parties previously stipulated to allow further limited discovery based on  
28

1 the passing of one of the Plaintiff's experts, requiring his replacement and further discovery  
2 stemming from that new expert and report.

3 The court previously signed a stipulation extending the deadlines for that discovery until  
4 December 28, 2023. The parties do hereby agree and stipulate that the discovery remaining may  
5 have a bearing on the Joint Pre-Trial Order and its contents. Therefore, the parties do now  
6 stipulate and agree to move the deadline for submission of the Joint Pre-Trial Order until Monday,  
7 January 29, 2024.

8 Dated: October 23, 2023

Dated: October 23, 2023

9 **HALL JAFFE, LLP**

10 /s/ Steven T. Jaffe

Steven T. Jaffe, Esq.  
Nevada Bar No. 7035  
7425 Peak Drive  
Las Vegas, Nevada 89128  
and  
Law Office of William H. Jackson, LLC  
John P. Shannon, Esq.  
Nevada Bar No. 7906  
Jason S. Cook, Esq.  
Nevada Bar No. 7965  
3320 N. Buffalo Dr., Suite 202  
Las Vegas, Nevada 89129  
*Attorneys for Plaintiff*

/s/ David J. Feldman

David J. Feldman, Esq.  
Nevada Bar No. 5947  
Rachel J. Holzer, Esq.  
Nevada Bar No. 11604  
8831 West Sahara Avenue  
Las Vegas, Nevada, 89117  
*Attorneys for Defendant Acuity A Mutual  
Insurance Company*

21 **IT IS SO ORDERED.**

24 Dated: October 24, 2023

25   
26 UNITED STATES MAGISTRATE JUDGE